

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) No. 08 CR 122-7
v) Hon. Maria Valdez
)
TERRY PETEN,)
)
Defendant.)

MOTION FOR RELEASE PENDING TRIAL

NOW COMES Defendant, Terry Peten, by and through his attorney, Ross M. Eagle and moves this Honorable Court to release Mr. Peten from detention pursuant to 18 U.S.C. §3141(a) and §3142(a). In support of this motion, Defendant states as follows:

1. Mr. Peten was arrested on February 12, 2008 under the above-listed complaint and brought before Magistrate Judge Valdez for an initial appearance the following day.
2. On February 13, 2008, Mr. Peten's detention hearing was continued until February 15, 2008.
3. On February 15, 2008, Mr. Peten waived his right to a detention hearing without prejudice reserving the right to move at a later time for release on conditions.
4. Mr. Peten now wishes to exercise his right to move this Honorable Court to hold a detention hearing and release him from detention under conditions acceptable to the Court.

WHEREFORE, Defendant, Terry Peten, respectfully requests this Honorable Court grant him a detention hearing and release him under conditions pursuant to statute.

Respectfully submitted,

/s/ Ross M. Eagle
Ross M. Eagle, Attorney for
Defendant Terry Peten

Ross M. Eagle
Jester, Kenworthy & Eagle LLC
53 West Jackson Boulevard, Suite 1324
Chicago, Illinois 60604
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NOTICE OF FILING

To: Terra Brown
United States Attorneys Office Pretrial Services
219 S. Dearborn St., 5th Floor 219 S. Dearborn St., Rm 15100
Chicago, Illinois 60604 Chicago, Illinois 60604

Please take notice that on March 13, 2008, I caused to be filed with the Clerk of the United States District Court of the Northern District of Illinois, Eastern Division, Terry Peten's Motion to For Bond, a copy of which is attached and hereby served upon you.

/s/ Ross M. Eagle

Ross M. Eagle, Attorney for
Defendant Terry Peten
53 W. Jackson Blvd. #1324
Chicago, Illinois 60604
312-435-9901

Certificate of Service

I, Ross M. Eagle, an attorney, certifies that in compliance with the Order of the United States District Court on Electronic Filing, a copy of the foregoing Motion to Modify Conditions of Bond was served by electronic means on the above listed persons on March 13, 2008

/s/ Ross M. Eagle